

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE STATE OF NEW YORK *EX REL* VINOD
KHURANA and THE CITY OF NEW YORK
EX REL VINOD KHURANA,

Plaintiffs,

v.

SPHERION CORP. (N/K/A SFN GROUP,
INC.),

Defendant.

Case No. 15-cv-06605-JFK

PLAINTIFF-RELATOR'S NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Statement of Material Facts Not in Dispute, the Declaration of Andrew M. McNeela and the exhibits attached thereto, and all prior proceedings in this action, Plaintiff-Relator Vinod Khurana ("Relator"), through his counsel, Kirby McInerney LLP, hereby respectfully moves this Court, at the Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, NY 10007, Courtroom 20C, before the Hon. John F. Keenan, to enter an order for partial summary judgment in favor of Relator pursuant to Federal Rule of Civil Procedure 56 with respect to his claims under the New York State False Claims Act, N.Y. Fin. Law § 191, and the New York City False Claims Act, Admin. Code § 7-805(a)(3).

PLEASE TAKE FURTHER NOTICE that, pursuant the briefing schedule entered by the Court, Defendants' opposition papers to Relator's motion, if any, are due on or before June 7, 2019, and Relator's reply papers, if any, are due on or before June 21, 2019. The Court has scheduled oral argument on this motion for June 26, 2019 at 11:00 a.m.

Dated: May 17, 2019

KIRBY McINERNEY LLP

By: /s/ David E. Kovel

David E. Kovel (dkovel@kmlp.com)
Andrew M. McNeela (amcneela@kmlp.com)
Seth M. Shapiro (sshapiro@kmlp.com)
250 Park Avenue, Suite 820
New York, NY 10177
Telephone: (212) 371-6600
Facsimile: (212) 699-1194

Counsel for Relator